



NATIONAL AIR
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ASSOCIATION

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July 9, 1999

U. S. Department of Transportation Dockets
Docket No. [FAA-1999-5836] - IO
400 Seventh Street SW
Room 401
Washington, DC 20509

U.S. DEPARTMENT OF TRANSPORTATION
DOCKET SECTION
99 JUL 12 AM 11:26

Notice of Proposed Rulemaking, Docket No. FAA-1999-5836; Part 145 Review: Repair Stations: Request for Comment Period Extension.


The National Air Transportation Association (NATA) represents the interests of over 2000 aviation businesses nationwide including repair stations certificated under 14 CFR Part 145 and operators of aircraft utilized in on-demand air charter under the requirements of 14 CFR Part 135.

NATA requests that the comment period be extended for an additional 60 days to permit a full 180-day comment period.

In preliminary reviews of the proposal and the accompanying documentation, NATA has discovered that there are serious flaws in the use of 6-year-old data from less than 5 percent of the repair station industry to support the economic impact of this proposal on a diverse industry of 4000 companies. This comprehensive re-write affects a significant number of small businesses; NATA must ensure that these businesses are educated on the proposal and have an ample opportunity to comment.

This additional time is necessary to permit the Association to notify our membership, audit the impact of this proposal on certificated repair stations, evaluate the economic impact of this proposal on aviation small businesses, and develop meaningful comments to this crucial regulatory rewrite.

Sincerely,


Andrew V. Cebula
Vice President